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**Subject:** 2010-2013 Discovery

**Date:** Thu, Dec 21, 2017 4:22 pm

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Counsel, per the CRB's order of August 11, 2017, discovery in the distribution phase of 2010-2013 cable is to occur during the sixty-day period following filing of the Written Direct Statements, which occurs tomorrow. As such, discovery is to conclude on February 20, 2018.

Keeping in mind that AWDS are due on March 9, 2018, i.e., seventeen days following the close of discovery, then I suggest the following:

Submission of document requests: December 29, 2017

Response to document requests (objections), and production responsive to document requests: January 5, 2018

Submission of follow-up document requests: January 19, 2018

Response to follow-up document requests (objections), and production responsive to follow-up document requests: January 29, 2018

Historically, objections to document requests has preceded the actual production. I have never understood why such would be the case, which varies from normal practice, and believe that it is more efficient for the objections to be delivered with the produced documents in order to avoid unnecessary speculation as to what will be forthcoming in the actual production. We can still do it as before if anyone has any strong feelings. I just personally find it unnecessary. I also believe that we've gone through this process enough to know what we are already obligated to produce, so should already have compiled that information. Finally, because the pleading cycles for any motions (e.g., motions to compel discovery) are now longer, any discovery issues can hopefully be resolved before the conclusion of discovery.

Please inform me whether you agree to the foregoing.

Brian

# Certificate of Service

I hereby certify that on Wednesday, February 07, 2018 I provided a true and correct copy of the Exhibit A to Response in Opposition on Settling Devotional Claimants' Motion to Quash Discovery Requests of Multigroup Claimants to the following:

Broadcast Music, Inc. (BMI), represented by Jennifer T. Criss served via Electronic Service at [jennifer.criss@dbi.com](mailto:jennifer.criss@dbi.com)

Major League Soccer, LLC, represented by Edward S. Hammerman served via Electronic Service at [ted@copyrightroyalties.com](mailto:ted@copyrightroyalties.com)

National Public Radio (NPR), represented by Gregory A Lewis served via Electronic Service at [glewis@npr.org](mailto:glewis@npr.org)

Public Broadcasting Service (PBS) and Public Television Claimants (PTC), represented by Ronald G. Dove Jr. served via Electronic Service at [rdove@cov.com](mailto:rdove@cov.com)

Broadcaster Claimants Group (BCG) aka NAB aka CTV, represented by David J Ervin served via Electronic Service at [dervin@crowell.com](mailto:dervin@crowell.com)

MPAA-Represented Program Suppliers (MPAA), represented by Gregory O Olaniran served via Electronic Service at [goo@msk.com](mailto:goo@msk.com)

Spanish Language Producers, represented by Brian D Boydston served via Electronic Service at [brianb@ix.netcom.com](mailto:brianb@ix.netcom.com)

Canadian Claimants Group, represented by Victor J Cosentino served via Electronic Service at [victor.cosentino@larsongaston.com](mailto:victor.cosentino@larsongaston.com)

Joint Sports Claimants (JSC), represented by Ritchie T. Thomas served via Electronic Service at [ritchie.thomas@squirepb.com](mailto:ritchie.thomas@squirepb.com)

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis served via Electronic Service at [smosenkis@ascap.com](mailto:smosenkis@ascap.com)

SESAC, Inc., represented by John C. Beiter served via Electronic Service at [jbeiter@lsglegal.com](mailto:jbeiter@lsglegal.com)

Settling Devotional Claimants (SDC), represented by Arnold P Lutzker served via Electronic Service at [arnie@lutzker.com](mailto:arnie@lutzker.com)

Signed: /s/ Brian D Boydston